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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,	:	<u>FELONY</u>
	:	<u>COMPLAINT</u>
Plaintiff,	:	
	:	VIOLATION: 2:20mj 415-DBP
vs.	:	
	:	Count 1: 18 U.S.C. § 844(i), Arson in
LATROI DEVON NEWBINS,	:	Interstate Commerce
	:	
Defendant.	:	Chief Magistrate Judge Dustin B. Pead
	:	

Before the Honorable Dustin B. Pead, United States Chief Magistrate Judge for the
District of Utah, appeared the undersigned, who on oath deposes and says:

COUNT 1
18 U.S.C. § 844(i)
[Arson in Interstate Commerce]

On or about May 30, 2020, in the District of Utah,

LATROI DEVON NEWBINS,

Defendant herein, maliciously damaged and destroyed, and attempted to maliciously damage and destroy, by means of fire and explosives, a vehicle, to wit: a Salt Lake City Police Department patrol car, used in interstate commerce and in activities affecting interstate commerce, and did aid and abet therein; all in violation of 18 U.S.C. §§ 844(i) and 2.

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

Complainant, JEFFREY T. WRIGHT, being duly sworn, hereby states:

1. I, Jeffrey T. Wright, am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation, and have been employed in that capacity for approximately 12 years. I am currently assigned to the Salt Lake City Division of the FBI and have primary investigative responsibility for federal crimes related to national security and domestic terrorism. I gained experience in the conduct of such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state and federal law enforcement agencies. I have been trained to investigate federal crimes and have investigated an array of complex federal crimes.
2. The statements in this affidavit are based, in part, on information provided by law enforcement officers, other investigators with knowledge of this investigation, and witnesses who observed the incident, as well as information obtained from the State of Utah. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint I have not included every fact known to me concerning this investigation. Rather, I have set forth only the facts necessary to establish probable

cause for the complaint.

Statement of Probable Cause

3. On May 30, 2020, protestors took to the streets of Salt Lake City, Utah, to call for justice after the killing of George Floyd on May 25, 2020 in Minneapolis, Minnesota. Similar protests occurred in other cities across the United States in the days following May 25, 2020. Some of the protests devolved into vandalism, property damage, arson and other riotous acts.
4. On May 30, 2020, protestors assembled on the streets of downtown Salt Lake City. Some of the protestors were non-residents of Utah.
5. The downtown area of Salt Lake City, Utah hosts myriad companies, commercial properties, retail establishments, restaurants, gas stations, public facilities and other businesses that were open for business on May 30, 2020, during the time of the protest.
6. During the protest, Salt Lake City Police Officers and other law enforcement personnel were deployed throughout the downtown area to protect individuals, businesses, and property. Police officers used law enforcement vehicles throughout the protest to transport law enforcement personnel, to provide emergency aid and assistance, and to serve as a resource for crowd control measures.
7. The Salt Lake City Police Department regularly conducts business in interstate commerce, for instance by purchasing vehicles and other equipment and supplies in interstate commerce. The activities of the Salt Lake City Police Department in

enforcing laws also affect interstate commerce.

8. On the afternoon of May 30, 2020, the peaceful protest in downtown Salt Lake City devolved into acts of destruction and violence. Rioters near the Salt Lake City library at 200 East 400 South overturned a Salt Lake City Police Department patrol car.

Moments later rioters set the patrol car ablaze.

9. Video footage of the riot displays rioters standing on top of the overturned patrol car.

Video footage also shows individual rioters using fire and explosives to damage and destroy the patrol car.

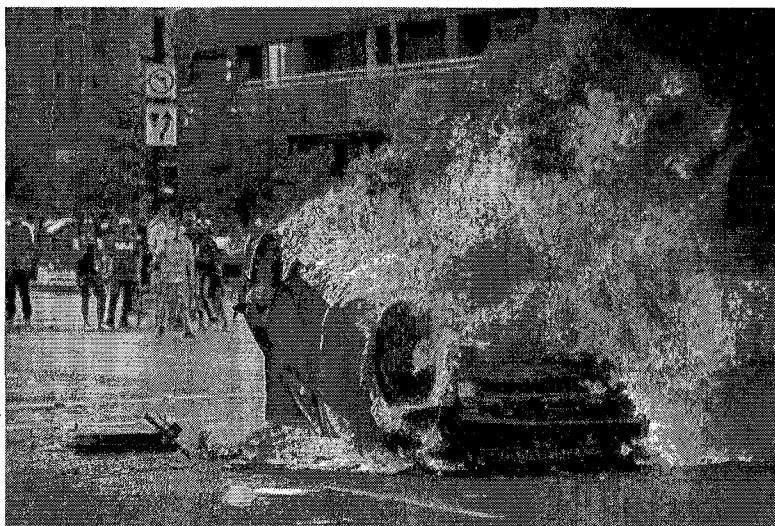
10. The patrol car was engulfed in flames, as shown in the photograph below:



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11. The patrol car was completely destroyed, as shown in the photograph below:



12. On May 31, 2020, ATF Special Agent Certified Fire Investigator Candidate Tyler Olson and Salt Lake City Fire Investigators examined the destroyed patrol car. The patrol car is a Chevrolet Impala. From the physical examination of the vehicle, and video and photographic evidence, it is SA Olson's opinion that the destruction of the patrol car was incendiary in nature.
13. A review of video footage from May 30, 2020 shows an individual running towards the patrol vehicle from the rear and throw what appears to be combustible material into the flames which appeared to act as kindling increasing the flames. This individual is described as an African American male wearing a black shirt with white lettering, blue shorts, a camouflage print hat, and eye glasses, as show in the photograph below:



14. This individual was observed in video footage standing on top of the overturned patrol vehicle prior to being ignited, as shown in the photograph below:



15. This same individual was observed on June 1, 2020 in news outlet footage being interviewed by reporters. The individual was observed wearing a white tee shirt, camouflage hat, and eye glasses. This same individual was observed throughout the evening talking to the demonstrators using a megaphone, appearing to be leading the demonstrators.
16. In reviewing open source footage from news outlets, a reporter is seen walking towards the individual and asks for his name. The individual responds to the reporter stating his name is "Latroi".
17. On June 2, 2020 law enforcement records were ran to find the identity of Latroi. Records show a Latroi Devon Newbins residing in Salt Lake City, Utah. An open source search for Latroi Newbins results in a news article from Fox 13 News stated "La'Troi Newbins negotiated a peaceful exit for the group without mass arrests." This news article is describing what was observed on news outlets from June 1, 2020.
18. Your affiant reviewed Utah Driver's License records for Latroi Devon Newbins, including the photograph on file. I compared the Driver's License photograph for Newbins to the photographs and video recordings described herein from May 30, 2020. Based upon that comparison, the individual in the Driver's License photo appears to be the same individual described in paragraphs 13-15.
19. Based on the foregoing information, I respectfully request an arrest warrant be issued for Latroi Devon Newbins for a violation of 18 U.S.C. § 844(i).

I swear that this information is true and correct to the best of my knowledge,
information, and belief.


DATED this 3rd day of June 2020.

/s/ Jeffrey T. Wright
JEFFREY T. WRIGHT
FBI Special Agent

Approved as to form:

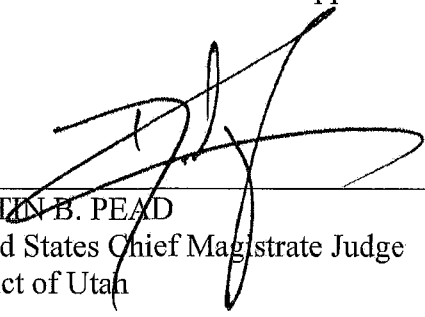
JOHN W. HUBER
United States Attorney

JONATHAN
YEATES

 Digitally signed by JONATHAN
YEATES
Date: 2020.06.03 08:20:59 -06'00'

J. DREW YEATES
Assistant United States Attorney

The affiant appeared before me by telephonic conference on this date pursuant to Fed.
R. Crim. P. 4.1 and affirmed under oath the content of this affidavit and application.


DUSTIN B. PEAD
United States Chief Magistrate Judge
District of Utah